

# **EXHIBIT J**

(2021 Email Correspondence)

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**From:** Merritt, Mark <MMerritt@robinsonbradshaw.com>  
**Sent:** Thursday, November 4, 2021 11:28 AM  
**To:** Brandon Neuman  
**Cc:** 'tab@rosenfeldlaw.com'; Jeff Kelly; Sarah Strickland; Christine McCaffrey; Kieran Shanahan; Merritt, Mark  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Brandon: These look fine and are good to file. Thanks for drafting.

As we discussed yesterday, we would be happy to discuss any proposal that would allow the production of the documents and the depositions to go forward without the need for briefing. If your clients have particular concerns that we could address, we would be pleased to discuss them.

Best regards, Mark

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**Mark W. Merritt**

**Robinson Bradshaw**  
t : 704.377.8337 | m : 704.726.8369  
101 N. Tryon St., Suite 1900  
Charlotte, NC 28246

[mmerritt@robinsonbradshaw.com](mailto:mmerritt@robinsonbradshaw.com) | [Bio](#)  
[robinsonbradshaw.com](http://robinsonbradshaw.com)

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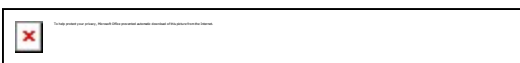
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**From:** Brandon Neuman <brandon.neuman@nelsonmullins.com>  
**Sent:** Thursday, November 4, 2021 10:39 AM  
**To:** Merritt, Mark <MMerritt@robinsonbradshaw.com>  
**Cc:** 'tab@rosenfeldlaw.com' <tab@rosenfeldlaw.com>; Jeff Kelly <jeff.kelly@nelsonmullins.com>; Sarah Strickland <sarah.strickland@nelsonmullins.com>; Christine McCaffrey <CMcCaffrey@shanahanlawgroup.com>; Kieran Shanahan <kieran.shanahan@nelsonmullins.com>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Hi Mark. Attached please find our proposed joint motion and order. Please let us know if you have any edits/comments.

Best,

Brandon



---

**BRANDON S. NEUMAN PARTNER**  
[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)  
GLENLAKE ONE | SUITE 200

**From:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Sent:** Thursday, November 4, 2021 9:17 AM  
**To:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Cc:** 'tab@rosenfeldlaw.com' <[tab@rosenfeldlaw.com](mailto:tab@rosenfeldlaw.com)>; Jeff Kelly <[jeff.kelly@nelsonmullins.com](mailto:jeff.kelly@nelsonmullins.com)>; Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

That is my understanding. Mark

**From:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Sent:** Thursday, November 4, 2021 9:04 AM  
**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Cc:** 'tab@rosenfeldlaw.com' <[tab@rosenfeldlaw.com](mailto:tab@rosenfeldlaw.com)>; Jeff Kelly <[jeff.kelly@nelsonmullins.com](mailto:jeff.kelly@nelsonmullins.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Hi Mark. We are preparing a draft joint motion for your review and will circulate to you this morning. This confirms the agreed briefing schedule as follows:

- Motion to Quash filed by November 30th
- Response to Motion to Quash filed by December 14th
- Reply filed by December 23rd.

One clarification point – based on the above schedule, if you happen to file your opposition brief earlier than the December 14<sup>th</sup> deadline, our reply deadline (December 23<sup>rd</sup>) will not be compressed. In other words, our deadline to file the Reply is December 23<sup>rd</sup>, regardless of the date upon which the response brief is filed. Please confirm that this is your understanding as well.

Best,

Brandon



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BRANDON S. NEUMAN **PARTNER**  
[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)  
GLENLAKE ONE | SUITE 200  
4140 PARKLAKE AVENUE | RALEIGH, NC 27612  
T 919.329.3878 F 919.329.3799  
NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

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**From:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Sent:** Tuesday, November 2, 2021 4:47 PM  
**To:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Cc:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>; 'tab@rosenfeldlaw.com' <[tab@rosenfeldlaw.com](mailto:tab@rosenfeldlaw.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Brandon: You have requested an extension of time in which to move to quash the two subpoenas until November 30. On behalf of my clients, we are willing to consent to that extension of time provided that Mr. Del Rosso and Vital Management will not seek any extension of time in which to file their reply brief in response to our opposition to the motion to quash. Under the Middle District Rules with respect to discovery motions, my clients will have 14 days to respond to the motion to quash, and reply briefs are due seven days thereafter. Given the pending trial date in April 2022 in the United Kingdom, we believe that this proposed schedule is a fair way in which to address your request for an extension and our need to resolve the motion to quash in a timely manner.

Please do not hesitate to call me if you would like to discuss. We should decide if we want to memorialize the extension and the briefing schedule in a joint motion to the court for an extension of time.

Best regards, Mark

---

**Mark W. Merritt**

**Robinson Bradshaw**  
t : 704.377.8337 | m : 704.726.8369  
101 N. Tryon St., Suite 1900  
Charlotte, NC 28246

[mmerritt@robinsonbradshaw.com](mailto:mmerritt@robinsonbradshaw.com) | [Bio](#)  
[robinsonbradshaw.com](http://robinsonbradshaw.com)

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**From:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Sent:** Tuesday, November 2, 2021 4:33 PM  
**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Mark:

As I indicated during our call on Friday of last week, for the avoidance of doubt, Mr. del Rosso and Vital Management object to the discovery sought in the Subpoenas and intend to file a motion to quash both Subpoenas.

Best,

Brandon



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**BRANDON S. NEUMAN PARTNER**  
[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)

GLENLAKE ONE | SUITE 200  
4140 PARKLAKE AVENUE | RALEIGH, NC 27612  
T 919.329.3878 F 919.329.3799  
NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

---

**From:** Brandon Neuman  
**Sent:** Tuesday, November 2, 2021 3:31 PM  
**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Mark:

Sorry to bother again, but checking in on the status.

Thanks



---

BRANDON S. NEUMAN **PARTNER**  
[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)  
GLENLAKE ONE | SUITE 200  
4140 PARKLAKE AVENUE | RALEIGH, NC 27612  
T 919.329.3878 F 919.329.3799  
NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

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**From:** Brandon Neuman  
**Sent:** Tuesday, November 2, 2021 10:16 AM  
**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Hi Mark. Following up on this. Thanks.



---

BRANDON S. NEUMAN **PARTNER**  
[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)  
GLENLAKE ONE | SUITE 200  
4140 PARKLAKE AVENUE | RALEIGH, NC 27612  
T 919.329.3878 F 919.329.3799  
NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

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**From:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Sent:** Monday, November 1, 2021 2:56 PM  
**To:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Will do.

**From:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Sent:** Monday, November 1, 2021 2:56 PM  
**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Cc:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** Re: Proposed Order 1:21-mc-00006-UA-LPA

Great. Can you please call my cell? 919-749-4444?

BRANDON S. NEUMAN - PARTNER  
Nelson Mullins  
[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)

GLENLAKE ONE | SUITE 200  
4140 PARKLAKE AVENUE | RALEIGH, NC 27612  
T [919.329.3878](tel:919.329.3878) F [919.329.3799](tel:919.329.3799)

---

**From:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Sent:** Friday, October 29, 2021 1:43:50 PM  
**To:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Cc:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Brandon: I am open Monday morning until noon but my afternoon is pretty booked up. I could be available in the afternoon from 3:00-3:30.

Regards, Mark

---

## Mark W. Merritt

Robinson Bradshaw  
t : 704.377.8337 | m : 704.726.8369  
101 N. Tryon St., Suite 1900  
Charlotte, NC 28246

[mmerritt@robinsonbradshaw.com](mailto:mmerritt@robinsonbradshaw.com) | [Bio](#)  
[robinsonbradshaw.com](http://robinsonbradshaw.com)

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**From:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>  
**Sent:** Tuesday, October 19, 2021 5:01 PM  
**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Cc:** 'Tab Rosenfeld' <[tab@rosenfelddlaw.com](mailto:tab@rosenfelddlaw.com)>; Haupt, Sherrill <[SHaupt@robinsonbradshaw.com](mailto:SHaupt@robinsonbradshaw.com)>; Merritt, Mark

<[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>

**Subject:** Re: Proposed Order 1:21-mc-00006-UA-LPA

Thank you.

BRANDON S. NEUMAN - **PARTNER**  
Nelson Mullins

[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)

GLENLAKE ONE | SUITE 200

4140 PARKLAKE AVENUE | RALEIGH, NC 27612

T [919.329.3878](tel:919.329.3878) F [919.329.3799](tel:919.329.3799)

---

**From:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>

**Sent:** Tuesday, October 19, 2021 4:59:28 PM

**To:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>

**Cc:** 'Tab Rosenfeld' <[tab@rosenfeldlaw.com](mailto:tab@rosenfeldlaw.com)>; Haupt, Sherrill <[SHaupt@robinsonbradshaw.com](mailto:SHaupt@robinsonbradshaw.com)>; Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>

**Subject:** RE: Proposed Order 1:21-mc-00006-UA-LPA

Thanks Brandon. You saved me a call to you. I will serve the subpoenas on you. We will send them out in the next day or two.

Regards, Mark

---

**Mark W. Merritt**

**Robinson Bradshaw**  
t : 704.377.8337 | m : 704.726.8369  
101 N. Tryon St., Suite 1900  
Charlotte, NC 28246

[mmerritt@robinsonbradshaw.com](mailto:mmerritt@robinsonbradshaw.com) | [Bio](#)  
[robinsonbradshaw.com](http://robinsonbradshaw.com)

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**From:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>

**Sent:** Tuesday, October 19, 2021 4:48 PM

**To:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>

**Cc:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>; 'Tab Rosenfeld' <[tab@rosenfeldlaw.com](mailto:tab@rosenfeldlaw.com)>; Haupt, Sherrill <[SHaupt@robinsonbradshaw.com](mailto:SHaupt@robinsonbradshaw.com)>

**Subject:** Re: Proposed Order 1:21-mc-00006-UA-LPA

Mark:

I hope this finds you well. I am following up from our previous correspondence in this matter, specifically that we still have authority to accept service of any related subpoenas on behalf of Mr. del Rosso and Vital Management. Based on that, we request that you direct services of the same to me as counsel, and not directly to Mr. del Rosso or Vital Management.

Best,

Brandon

BRANDON S. NEUMAN - PARTNER  
Nelson Mullins

[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)

GLENLAKE ONE | SUITE 200

4140 PARKLAKE AVENUE | RALEIGH, NC 27612

T [919.329.3878](tel:919.329.3878) F [919.329.3799](tel:919.329.3799)

---

**From:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>

**Sent:** Monday, March 1, 2021 11:49:03 AM

**To:** Brandon Neuman <[brandon.neuman@nelsonmullins.com](mailto:brandon.neuman@nelsonmullins.com)>

**Cc:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>; 'Tab Rosenfeld' <[tab@rosenfeldlaw.com](mailto:tab@rosenfeldlaw.com)>; Haupt, Sherrill <[SHaupt@robinsonbradshaw.com](mailto:SHaupt@robinsonbradshaw.com)>

**Subject:** FW: Proposed Order 1:21-mc-00006-UA-LPA

◀External Email▶ - From: [mmerritt@robinsonbradshaw.com](mailto:mmerritt@robinsonbradshaw.com)

Brandon: The Application has been assigned to Magistrate Judge Auld. We submitted the proposed order to him today in accordance with the local rules as shown in the email below.

If you need to reach me, please call me on my mobile number, which is below.

Best regards, Mark

---

**Mark W. Merritt**

Robinson Bradshaw

t : 704.377.8337 | m : 704.726.8369 | f : 704.373.3937  
101 N. Tryon St., Suite 1900  
Charlotte, NC 28246

[mmerritt@robinsonbradshaw.com](mailto:mmerritt@robinsonbradshaw.com) | [Bio](#)  
[robinsonbradshaw.com](http://robinsonbradshaw.com)

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**From:** Haupt, Sherrill <[SHaupt@robinsonbradshaw.com](mailto:SHaupt@robinsonbradshaw.com)>  
**Sent:** Monday, March 1, 2021 10:29 AM  
**To:** 'JAuld@ncmd.uscourts.gov' <[JAuld@ncmd.uscourts.gov](mailto:JAuld@ncmd.uscourts.gov)>  
**Cc:** Merritt, Mark <[MMerritt@robinsonbradshaw.com](mailto:MMerritt@robinsonbradshaw.com)>  
**Subject:** Proposed Order 1:21-mc-00006-UA-LPA

Magistrate Judge Auld,

Attached is a proposed Order in Word format for your consideration with regard to the filed Application for an Order Under 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings (ECF 1).

---

**Sherrill B. Haupt**

Legal Practice Assistant  
Robinson Bradshaw

t : 704.350.7123 | f : 704.378.4000  
101 N. Tryon St., Suite 1900  
Charlotte, NC 28246

[shaupt@robinsonbradshaw.com](mailto:shaupt@robinsonbradshaw.com)  
[robinsonbradshaw.com](http://robinsonbradshaw.com)

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